

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

ROBERT MOHNACKY,

Plaintiff,

v.

FTS INTERNATIONAL SERVICES, LLC,

Defendant.

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Case No. 5:13-cv-246

**DEFENDANT'S PRETRIAL DISCLOSURES**

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure and the Docket Control Order governing this matter, Defendant FTS International Services, LLC, serves *Defendant's Pretrial Disclosures* as follows:

**26(a)(3)(i):** The name and, if not previously provided, the address and telephone number of each witness – separately identifying those the party expects to present and those it may call if the need arises:

Defendant Expects to Present:

Danny Purvis  
Coy Randle  
Michelle Speers  
Lianne Sterkel  
Charles Veazey  
c/o Paul E. Hash  
Jackson Lewis, P.C.  
500 N. Akard, Suite 2500  
Dallas, Texas 75206  
(214) 520-2400

Defendant May Call If Need Arises:

Brian Holland  
15122 Preston Hollow  
San Antonio, Texas 78247

Dan Tyree  
c/o Paul E. Hash  
Jackson Lewis, P.C.  
500 N. Akard, Suite 2500  
Dallas, Texas 75206  
(214) 520-2400

All witnesses identified by Plaintiff

Expert witnesses who may testify regarding Plaintiff's claim for attorney fees:

Paul E. Hash  
Michael J. DePonte  
Jackson Lewis P.C.  
500 N. Akard, Suite 2500  
Dallas, Texas 75201  
(214) 520-2400

Michael DePonte  
Jackson Lewis P.C.  
One Congress Plaza  
111 Congress Avenue  
Thirteenth Floor  
Austin, TX 78701  
(512) 362-7100

**26(a)(3)(ii):** The designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition:

None at this time.

**26(a)(3)(iii):** An identification of each document or other exhibit, including summaries of other evidence – separately identifying those items which the party expects to offer and those it may offer if the need arises.

Defendant expects to offer:

Plaintiff's Personnel File and Employment Records  
Plaintiff's Payroll and Time Records

Defendant may offer if the need arises:

All documents identified as exhibits by Plaintiff

All documents produced by Plaintiff

All documents produced by Defendant

Respectfully submitted,

/s/ Paul E. Hash

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Dallas, Texas 75201

PH: (214) 520-2400

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ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing pleading was electronically filed with the clerk for the U.S. District Court, Eastern District of Texas, on February 10, 2014, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means:

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Little Rock, Arkansas 72211

/s/ Paul E. Hash

ONE OF COUNSEL